

Acquisition and Property Division Policy Memorandum

Subject: Government Printing Office (GPO) Waivers and the Use of Commercial Vendors for Reproduction Services			Number: 08-01-A
Distribution: ARS CSREES ERS NASS FD APD	Date: November 10, 2003	This Replaces: 08-01	

Background: Often, the role of the procurement official is questioned regarding his/her duty to assure that an appropriate GPO waiver is obtained before a procurement action is taken for printing requirements that are not done by or through the Government Printing Office. Also, questions frequently arise concerning the legality of using commercial firms (e.g. Kinko's, Office Depot, Staples, etc.) for reproduction services.

Policy Guidance: AGAR Subpart 408.8 specifically states that "the contracting officer shall verify that the requisite approval (waiver) has been received by the publication liaison officer or requisitioner." Additionally, "the approval shall be maintained in the contract file." The Government Printing and Binding regulations require that all waivers be obtained from the Government Printing Office (GPO) or Congress. **There is no exception for quantity, dollar amount, or urgency in the regulations -any requirement for printing must be acquired through the GPO unless a waiver is obtained from the GPO.** Requisitioners can request a waiver directly from their cognizant Regional GPO Printing and Procurement Office for printing needs up to \$1,000. If the printing estimate exceeds \$1,000, then all requests for GPO approval must go directly to the USDA's Office of Communications, Printing Management Division, who will then submit the request to the Joint Committee on Printing (JCP). The Office of Communications has no approval authority; however, they will obtain the approval/disapproval from the JCP and then forward it back to the requisitioner. Departmental Regulation 1420-2, Printing Policy, outlines the procedures for submitting requests to the Printing Management Division.

It is not the responsibility of procurement personnel to obtain these approvals or waivers for printing requirements. These approvals are required to be included with the AD-700 and the statement of work before the procurement staff can determine that the requirement is complete and “ready” for procurement action. Policy on printing requirements is contained in REE P&P 151.1-ARS.

If the purchase card is used, the file must contain the appropriate approval documentation.

Public Law (PL) 102-392, as amended by PL 103-283, July 22, 1994, broadened the term “printing” to include “duplicating.” The terms “duplicating” and “copying” are often used interchangeably. GPO defines “duplicating/copying” as *duplicating equipment employing the lithographic process and automatic copy-processing or copier-duplicating machines employing electrostatic, or other copying processes*. Additionally, in a recent General Accounting Office decision, B-290901, December 16, 2002, the Comptroller General included the term “photocopying” in the definition of printing. In other words, reproduction work provided by commercial vendors falls under the category of “printing”.

Action Required by
REE Contracting
Officers

PAOs must make distribution of this policy to locations. For printing requirements not to be processed through the GPO, assure the requisitioner has provided the necessary approval. Immediately cease the use of blanket purchase agreements currently in place for copying services until the appropriate waiver is obtained.

If you have any questions, please contact your cognizant Area Procurement Assistance Officer to obtain proper guidance.

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Approved:

_____/s/
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